

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler, District Court Judge

Honorable Karen M. Williams, Magistrate Judge

Honorable Thomas Vanaskie (Ret.), Special Discovery Master

**[PROPOSED] ORDER**

**THIS MATTER** having come before the Court upon the ZHP Parties' Objection to Special Master Order No. 28, and the Court having considered the parties' submissions; and for good cause shown:

It is, on this \_\_\_\_\_ day of \_\_\_\_\_

2021, **ORDERED AND ADJUDGED** that the motion to vacate Special Master Order No. 23 is **GRANTED**;

IT IS FURTHER ORDERED that the ZHP Parties' motion for a protective order precluding the deposition of Mr. Chen is **GRANTED**.

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Robert B. Kugler,  
United States District Judge